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*Attorneys for Defendant Capital One, N.A.,
erroneously sued as "Capital One Bank"*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ALICIA M. GENNA,

Plaintiff,

vs.

EQUIFAX INFORMATION
SERVICES, LLC; TRANS UNION,
LLC, COLUMBIA DEBT RECOVERY,
LLC DBA GENESIS CREDIT, LLC;
CAPITAL ONE BANK; KOHLS INC;
TD BANK USA,

Defendants.

Case No. 2:22-CV-01429-GMN-EJY

**STIPULATION TO EXTEND TIME FOR
DEFENDANT CAPITAL ONE, N.A. TO
RESPOND TO FIRST AMENDED
COMPLAINT
(FIRST REQUEST)**

Pursuant to Local Rules 6-1 and 6-2, defendant Capital One, N.A. ("Capital One"), erroneously sued as "Capital One Bank" and plaintiff Alicia M. Genna ("Plaintiff"), by and through their counsel of record, hereby submit this Stipulation To Extend Capital One's Time to Respond to Plaintiff's First Amended Complaint, as follows:

WHEREAS:

1. Plaintiff filed the Complaint in this matter in this Court on September 2, 2022;
2. Plaintiff sent Capital One a Waiver of the Service of Summons for the initial

1 Complaint, which was signed by Capital One on September 19, 2022;¹

2 3. The Court's Docket in this matter reflects that Capital One's deadline to respond to the
3 initial Complaint is November 18, 2022;

4 4. On October 7, 2022, Plaintiff filed a First Amended Complaint ("FAC"), which it later
5 sent to Capital One via email;

6 5. To resolve any issues regarding service and the applicable responsive pleading
7 deadline, the parties have conferred and agreed to set Capital One's deadline to file its response to the
8 FAC, such that the responsive pleading deadline would be December 2, 2022;

9 6. That extension from the initial deadline will allow additional time for Capital One and
10 Plaintiff to research the allegations, share information and explore the potential for an early resolution
11 before incurring further litigation costs;

12 7. This is the first extension sought in connection with this deadline;

13 8. This extension is requested to allow the parties time to continue investigating Plaintiff's
14 claims and exploring the potential for an early resolution;

15 9. Neither Plaintiff nor any other party to this action will be prejudiced by the Court
16 granting Capital One the requested relief; and

17 10. The requested extension is not for the purposes of unnecessary delay.

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26 ¹ The Waiver was signed on behalf of Capital One Bank (USA), N.A. On October 1, 2022,
27 Capital One Financial Corporation completed the merger of its wholly-owned subsidiary Capital
28 One Bank (USA), N.A. with and into Capital One, National Association ("CONA"), a wholly-
owned subsidiary of Capital One Financial Corporation, with CONA as the surviving entity.

NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:

Capital One's time to file a responsive pleading to Plaintiff's First Amended Complaint is extended. Capital One shall file its responsive pleading on or before December 2, 2022.

DATED: November 14, 2022

DATED: November 14, 2022

KRIEDER LAW GROUP, LLC

MCDONALD CARANO LLP

By: /s/ Shawn W. Miller

By: /s/ Karyna M. Armstrong

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Attorneys for Plaintiff Alicia M. Genna

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N.A.*

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: November 15, 2022